

STERN & EISENBERG, PC  
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(COUNSEL FOR MOVANT)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Jacqueline White Debtor(s) Carisbrook Asset Holding Trust Creditor/Movant  v. Jacqueline White Respondent
--

Chapter 13

Bankruptcy Case: 18-15137-amc

Judge: Ashely M. Chan

O R D E R

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ upon the Motion for Relief From Automatic Stay and upon Consent Order/Stipulation of Carisbrook Asset Holding Trust and any successor in interest and Debtor, Jacqueline White, approved by this Court and Certification of Default filed by counsel for Movant, after opportunity to cure, it is ORDERED and DECREED that:

The Automatic Stay of all proceedings, as provided under §362 of the Bankruptcy Code (The Code) 11 U.S.C. §362, is modified to allow Carisbrook Asset Holding Trust and any successor in interest, to proceed with it under state and federal law concerning the Property (the “Property”): ***6107 Cobbs Creek Parkway, Philadelphia, PA 19143.***

It is further ORDERED and DECREED that the 14-day stay pursuant to BKRP 4001(a)(3) is hereby waived.

BY THE COURT:

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

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**CERTIFICATION OF DEFAULT**

I, Daniel P. Jones, Esquire, of Stern & Eisenberg, PC, Counsel for Carisbrook Asset Holding Trust, hereby certify that the Debtor, Jacqueline White, is in default of the Stipulation approved on January 2, 2019, for failing to make the required payments as set forth in the attached Notice of Default together with any subsequent payments that have come due and owing. See Exhibit "A" which is attached hereto and made a part hereof.

Pursuant to the Stipulation, Counsel hereby requests the Court enter the Order for Relief attached hereto.

STERN & EISENBERG, PC

By: /s/ Daniel P. Jones, Esq.  
Daniel P. Jones, Esq.,  
1581 Main Street, Suite 200  
The Shops at Valley Square  
Warrington, PA 18976  
Phone: (215) 572-8111  
Fax: (215) 572-5025  
Bar Number: 321876  
Email: [djones@sterneisenberg.com](mailto:djones@sterneisenberg.com)

Date: November 14, 2019

STERN & EISENBERG, PC  
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In Re:  
Jacqueline White  
Debtor(s)  
Carisbrook Asset Holding Trust  
Creditor/Movant  
v.  
Jacqueline White  
Respondent

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**CERTIFICATE OF SERVICE**

I, Daniel P. Jones, Esquire, hereby certify that a copy of the within Certification of Default was served on the Debtor, Debtor's Counsel, and the Chapter 13 Trustee in accordance with the Rules of Bankruptcy Procedure on November 6, 2019 via First Class Mail.

Brad J. Sadek, Esquire  
1315 Walnut Street, Suite 502, Philadelphia, PA 19107

Jacqueline White  
6107 Cobb Creek Pkwy, Philadelphia, PA 19143

William C. Miller, Esq., Trustee  
P.O. Box 1229, Philadelphia, PA 19105

STERN & EISENBERG, PC

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